

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

TARSHICA ROGERS,

Plaintiff,

v.

WAL-MART STORES EAST, LP,

Defendant.

CIVIL ACTION NO. 2:17-cv-00378-DEM

**JOINT MOTION FOR EXTENSION OF DEADLINE TO
FILE DISPOSITIVE MOTIONS**

Plaintiff Tarshica Rogers and Defendant Wal-Mart Stores East, LP (“Wal-Mart”), by and through their respective counsel, move this Court for an extension of the deadline to file dispositive motions. In support of this Motion, the parties state as follows:

1. This action commenced with the filing of Plaintiff’s complaint on July 14, 2017. Defendant filed its answer on November 9, 2017.

2. A scheduling order was issued on December 22, 2017 providing for discovery completion on or before May 29, 2018.

3. On May 2, 2018, the parties filed a joint motion to extend the deadline to complete discovery from May 29, 2018 to July 13, 2018.

4. On May 3, 2018, the Court granted the parties’ motion and extended the time to complete discovery to July 13, 2018 but did not modify any other deadlines.

5. Currently, dispositive motions are due on June 12, 2018, which is now before the July 13, 2018 date for close of discovery.

6. The parties request an extension of one month after the close of discovery, until August 13, 2018, to file dispositive motions. The parties further request that responses to dispositive motions are due August 27, 2018, and replies are due September 3, 2018.

7. Extension of these deadlines will not prejudice the parties nor will it impact the trial date which is currently scheduled for October 23, 2018.

WHEREFORE, for the foregoing reasons, the parties respectfully urge this Court to grant this Consent Motion and extend the deadline to file dispositive motions until August 13, 2018, with responses due August 27, 2017, and replies due September 3, 2018.

Dated: this 1st day of June, 2018

Respectfully submitted,

By: /s/ R. Barry Rowell
R. Barry Rowell
VA Bar No. 72255

By: /s/ Jacquelyn L. Thompson
Jacquelyn L. Thompson
VA Bar No. 82726

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Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 1st day of June, 2018, I caused the foregoing
CONSENT MOTION FOR EXTENSION OF DEADLINE TO FILE DISPOSITIVE MOTIONS
to be to be filed with the Court using the CM/ECF system which will then send electronic
notification of the filing to the following:

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